



THE BAYONNE FIRM

GILBERT S. BAYONNE, ESQ.

1850 Amsterdam Ave

Email: gbayonne@thebayonnefirm.com
Application granted. The sentencing scheduled for February 4, 2025 is adjourned to May 8, 2025 at 2:30 p.m. It is the Government's responsibility to have the defendant produced to Courtroom 520 at that time. The Court will advance the sentencing date if an earlier date becomes available so Defendant's sentencing submission is due by March 7, 2025 and the Government's response is due by March 14, 2025.

The Clerk of Court is respectfully directed to terminate the pending letter-motions (Docs. 33 and 36).

SO ORDERED.


Philip M. Halpern
United States District Judge

Dated: White Plains, New York
January 8, 2025

January 7, 2024

Via ECF

Hon. Philip M. Halpern
U.S. District Court, Southern District of New York
300 Quarropas Street, Courtroom 520
White Plains, NY 10601 Philip M. Halpern
New York, N.Y. 10007

Re: Request for Adjournment of Sentencing
United States v. Nelvin Mejia-Marte 7:24-cr-277 (PMH)

Your Honor,

I am writing to respectfully request an adjournment of the sentencing hearing in this matter, currently scheduled for February 4, 2025. On November 10, 2024, I submitted a request for Mitigation Specialist George Ramos to gain access to MDC Brooklyn to conduct interviews and evaluations with Mr. Mejia Marte. *See*, Email to MDC regarding Clearance for Mitigation Specialist attached hereto as **Exhibit A**. Mr. Ramos was privately retained by Mr. Mejia Marte. Since that initial submission, I have sent six follow-up emails but have not received a response regarding the clearance. *See*, **Exhibit A**.

After receiving no response from MDC's Legal Department, I submitted a letter on January 6, 2025, requesting a status update regarding the clearance request. *See*, Letter to MDC, Legal Department attached hereto as **Exhibit B**. On January 7, 2025, I received confirmation that Mr. Ramos had been cleared to enter the facility and conduct his evaluation of Mr. Mejia Marte. *See*, **Exhibit A**.

Given the timing of this clearance, I respectfully request an adjournment of the sentencing hearing to allow sufficient time for Mr. Ramos to complete his evaluation. Additionally, I have conferred with the government, which has consented to this request.

Thank you for your attention to this matter.



THE BAYONNE FIRM

GILBERT S. BAYONNE, ESQ.

1850 Amsterdam Ave

New York, NY, 10031

Tel: (929) 333-6497

Fax: (929) 259-5468

Email: gbayonne@thebayonnefirm.com

Respectfully,

/s/ Gilbert S. Bayonne

Gilbert S. Bayonne, Esq.

Cc: All Counsel of Record (via ECF)



Gilbert Bayonne <gbayonne@thebayonnefirm.com>

Incomplete: Clearance for Mitigation Specialist - Nelvin Mejia Marte 57958-510
19 messages

BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov> Thu, Nov 7, 2024 at 9:05 AM
To: Gilbert Bayonne <gbayonne@thebayonnefirm.com>

Good morning,

We have received your application. However, you are missing the letter from your Sponsoring Attorney. When this is received, the process can take 2-3 weeks to be completed. Once completed you will receive notification via email.

Thank you in advance
Ms. Lewis

Legal Department
U.S. Department of Justice
Federal Bureau of Prisons
MDC Brooklyn | MCC New York | FCI Otisville
CLC New York
80 29th Street
Brooklyn, New York 11232
P: (718) 840-4200
E: BRO-LegalVisit-S@bop.gov

SENSITIVE/PRIVILEGED COMMUNICATION

The information contained in this electronic message and any and all accompanying documents constitutes sensitive information. This information is the property of the U.S. Department of Justice. If you are not the intended recipient of this information, any disclosures, copying, distribution, or the taking of any action in reliance on this information is strictly prohibited. If you received this message in error, please notify us immediately to make arrangements for its return to us.

From: Gilbert Bayonne <gbayonne@thebayonnefirm.com>
Sent: Saturday, November 2, 2024 9:56 AM
To: BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov>
Subject: [EXTERNAL] Clearance for Mitigation Specialist - Nelvin Mejia Marte 57958-510

Good morning,

Please see the attached clearance request and photo ID.

Thank you.

GILBERT S. BAYONNE, Esq.
The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Sun, Nov 10, 2024 at 10:05 AM

Understood. Please see attached.

Thank you.

[Quoted text hidden]

 **Sponsoring Atty Letter .pdf**
97K

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>
Cc: In-Home Wellness Mental Health Counseling <GeorgeRamosLMHC@gmail.com>

Mon, Dec 16, 2024 at 12:08 PM

Following up on this, as the clearance request was submitted over one month ago, and the client's sentencing hearing date is approaching.

Thank you.

GILBERT S. BAYONNE, Esq.
The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

[Quoted text hidden]

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Thu, Dec 19, 2024 at 9:28 AM

Cc: In-Home Wellness Mental Health Counseling <GeorgeRamosLMHC@gmail.com>

Good morning,

Following up.

Thank you.

GILBERT S. BAYONNE, Esq.

The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

CONFIDENTIALITY WARNING

Gilbert Bayonne <gbayonne@thebayonnefirm.com>

Fri, Dec 27, 2024 at 6:44 AM

To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Cc: In-Home Wellness Mental Health Counseling <GeorgeRamosLMHC@gmail.com>

Following up again. We need the clearance for preparation for sentencing and the request is beyond four weeks old.

Thanks

GILBERT S. BAYONNE, Esq.

The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

CONFIDENTIALITY WARNING

Gilbert Bayonne <gbayonne@thebayonnefirm.com>

Tue, Dec 31, 2024 at 9:44 AM

To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Cc: In-Home Wellness Mental Health Counseling <GeorgeRamosLMHC@gmail.com>

Good morning,

this will be my fourth time following regarding the status of this request.

Thank you.

GILBERT S. BAYONNE, Esq.
The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

[Click here to reply](#)

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Fri, Jan 3, 2025 at 10:58 AM

Good morning,

Following up regarding this.

GILBERT S. BAYONNE, Esq.
The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

[Click here to reply](#)

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Mon, Jan 6, 2025 at 8:09 PM

See attached request.

[Click here to reply](#)

 **Status of Clearance Request .pdf**
62K

BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov>
To: Gilbert Bayonne <gbayonne@thebayonnefirm.com>
Cc: "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>

Tue, Jan 7, 2025 at 9:15 AM

Good morning,

Hope this email finds you well. I have attached the email that was sent to you. One I have received the required documents you will notified by email.

Thank you in advance,
Legal Assistant J. Hayes

Thu, Nov 7, 2024 at 9:04AM BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov> wrote:
Good morning,

We have received your application. However, you are missing the letter from your Sponsoring Attorney. When this is received, the process can take 2-3 weeks to be completed. Once completed you will receive notification via email.

Thank you in advance
Ms. Lewis

Legal Department

U.S. Department of Justice
Federal Bureau of Prisons
MDC Brooklyn | MCC New York | FCI Otisville
CLC New York
80 29th Street
Brooklyn, New York 11232
P: (718) 840-4200
E: BRO-LegalVisit-S@bop.gov

SENSITIVE/PRIVILEGED COMMUNICATION

The information contained in this electronic message and any and all accompanying documents constitutes sensitive information. This information is the property of the U.S. Department of Justice. If you are not the intended recipient of this information, any disclosures, copying, distribution, or the taking of any action in reliance on this information is strictly prohibited. If you received this message in error, please notify us immediately to make arrangements for its return to us.

From: Gilbert Bayonne <gbayonne@thebayonnefirm.com>**Sent:** Monday, January 6, 2025 8:09 PM**To:** BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov>**Subject:** [EXTERNAL] Re: Incomplete: Clearance for Mitigation Specialist - Nelvin Mejia Marte 57958-510

Quoted text hidden

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Tue, Jan 7, 2025 at 9:20 AM

The requested document was submitted months ago on November 10, 2024. Please see the previous email within this thread containing the sponsoring attorney letter. I am the sponsoring attorney. Please confirm when this matter is resolved and clearance is approved.

GILBERT S. BAYONNE, Esq.
The Bayonne Firm, LLC
1850 Amsterdam Avenue, Suite 2S
New York, NY 10031
(929) 333-6497
gbayonne@thebayonnefirm.com

CONFIDENTIALITY WARNING: This message (including any attachments) may contain confidential, proprietary, privileged and/or private information. The information is intended to be for the use of the individual or entity designated above. If you are not the intended recipient of this message, please notify the sender immediately, and delete the message and any attachments. Any disclosure, reproduction, distribution or other use of this message or any attachments by an individual or entity other than the intended recipient is prohibited.

Quoted text hidden

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>

Tue, Jan 7, 2025 at 9:22 AM

See attached. This was sent on 11/10/24.

Quoted text hidden

 **Sponsoring Atty Letter .pdf**
97K

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>, spapapetru@bop.gov

Tue, Jan 7, 2025 at 9:31 AM

The requested document was submitted months ago on November 10, 2024. Please see the previous email within this thread containing the sponsoring attorney letter. I am the sponsoring attorney. Please confirm when this matter is resolved and clearance is approved.

Quoted text hidden

 **Sponsoring Atty Letter .pdf**
97K

BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov>
To: Gilbert Bayonne <gbayonne@thebayonnefirm.com>, "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>

Tue, Jan 7, 2025 at 10:21 AM

Good morning,

Hope this email finds you well. Application process has been completed. Entry into MDC Brooklyn has been granted for Mr. Ramos. Thank you in advanced for your patience.

Legal Assistant J. Hayes

Legal Department

U.S. Department of Justice
Federal Bureau of Prisons
MDC Brooklyn | MCC New York | FCI Otisville
CLC New York
80 29th Street
Brooklyn, New York 11232
P: (718) 840-4200
E: BRO-LegalVisit-S@bop.gov

SENSITIVE/PRIVILEGED COMMUNICATION

The information contained in this electronic message and any and all accompanying documents constitutes sensitive information. This information is the property of the U.S. Department of Justice. If you are not the intended recipient of this information, any disclosures, copying, distribution, or the taking of any action in reliance on this information is strictly prohibited. If you received this message in error, please notify us immediately to make arrangements for its return to us.

From: Gilbert Bayonne <gbayonne@thebayonnefirm.com>

Sent: Tuesday, January 7, 2025 9:31 AM

To: BRO-LegalVisit-S (BOP) <BRO-LegalVisit-S@bop.gov>; Papapetru, Sophia (BOP) <spapapetru@bop.gov>

Subject: Re: [EXTERNAL] Re: Incomplete: Clearance for Mitigation Specialist - Nelvin Mejia Marte 57958-510

[Content redacted]

[Redacted content block]

Thanks!
(Quoted text hidden)

Gilbert Bayonne <gbayonne@thebayonnefirm.com>
To: "BRO-LegalVisit-S (BOP)" <BRO-LegalVisit-S@bop.gov>
Cc: "Papapetru, Sophia (BOP)" <spapapetru@bop.gov>

Tue, Jan 7, 2025 at 10:26 AM

Thank you!
(Quoted text hidden)

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



THE BAYONNE FIRM

GILBERT S. BAYONNE, ESQ.

1850 Amsterdam Ave

New York, NY, 10031

Tel: (929)333-6497

Fax: (929) 259-5468

Email: gbayonne@thebayonnefirm.com

January 6, 2025

Via Email

Legal Department

Metropolitan Detention Center

80 29th Street

Brooklyn, New York 11232

Re: Status of Clearance Request for Mitigation Specialist
Nelvin Mejia Marte/57958-510

Dear Sir/Madam:

I am writing to follow up on a clearance request submitted on November 10, 2024, seeking permission for Mitigation Specialist George Ramos to enter MDC Brooklyn to conduct interviews and evaluations with my client, Nelvin Mejia Marte (Reg. No. 57958-510).

Since the initial submission, I have sent six (6) follow-up emails regarding this matter but have yet to receive a response. At the time of submission, I was informed that these requests typically require up to three weeks for processing. However, the prolonged delay has forced our office to request an adjournment of court proceedings, which has caused significant inconvenience and disruption.

Given the time elapsed since the original request and the critical nature of this clearance, I respectfully request an update on the status of the matter and urge that it be expedited to avoid further delays.

Thank you for your attention to this issue. I appreciate your prompt response.

Respectfully,

/s/

Gilbert S. Bayonne, Esq.